

AUSAs: Benjamin Levander and Ryan Allison

UNITED STATES OF AMERICA

v.

PAWEL BIELECKI,
a/k/a “Paul Bielecki,”
a/k/a “Paul HRH Saxe-Coburg-Gotha,”
a/k/a “Dr. Phaakon Sonderburg-Glucksburg,”
a/k/a “Father Paul,”
a/k/a “Father Kowal,”

Defendant.

24 mj 3029

SEALED COMPLAINT

Violations of 18 U.S.C. §§ 1341 & 1343

COUNTIES OF OFFENSE:
WESTCHESTER/MANHATTAN

SOUTHERN DISTRICT OF NEW YORK, ss.:

SEAN SMYTH, being duly sworn, deposes and says that he is a Special Agent with the United States Attorney’s Office for the Southern District of New York (“USAO-SDNY”), and charges as follows:

COUNT ONE
(Wire Fraud)

1. From at least in or about June 2015 through at least in or about August 2024, in the Southern District of New York and elsewhere, PAWEL BIELECKI, a/k/a “Paul Bielecki,” a/k/a “Paul HRH Saxe-Coburg-Gotha,” a/k/a “Dr. Phaakon Sonderburg-Glucksburg,” a/k/a “Father Paul,” a/k/a “Father Kowal,” the defendant, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, to wit, BIELECKI, via interstate wire and radio communications in the Southern District of New York and elsewhere, executed a scheme to defraud victims by falsely representing that he was a medical doctor who runs medical clinics in Beirut, Lebanon, in order to fraudulently obtain donations from victims, when in fact, as BIELECKI knew, BIELECKI is not a doctor, BIELECKI does not run medical clinics in Beirut or elsewhere, and BIELECKI was keeping the victims’ donations for his personal use.

(Title 18, United States Code, Sections 1343.)

COUNT TWO
(Mail Fraud)

2. From at least in or about June 2015 through at least in or about August 2024, in the Southern District of New York and elsewhere, PAWEL BIELECKI, a/k/a “Paul Bielecki,” a/k/a

“Paul HRH Saxe-Coburg-Gotha,” a/k/a “Dr. Phaakon Sonderburg-Glucksburg,” a/k/a “Father Paul,” a/k/a “Father Kowal,” the defendant, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money or property by means of false and fraudulent pretenses, representations, and promises, for the purpose of executing such scheme and artifice and attempting so to do, placed in a post office and authorized depository for mail matter, a matter and thing whatever to be sent and delivered by the Postal Service, and deposited and caused to be deposited a matter and thing whatever to be sent and delivered by a private and commercial interstate carrier, and took and received therefrom, such matter and thing, and knowingly caused to be delivered by mail and such carrier according to the direction thereon, and at the place at which it was directed to be delivered by the person to whom it was addressed, such matter and thing, to wit, BIELECKI executed a scheme to defraud victims by falsely representing that he was a medical doctor who runs medical clinics in Beirut, Lebanon, in order to fraudulently obtain donations from victims, which BIELECKI induced victims to send by mail to addresses in White Plains, New York and New York, New York, when in fact, as BIELECKI knew, BIELECKI is not a doctor, BIELECKI does not run medical clinics in Beirut or elsewhere, and BIELECKI was keeping the victims’ donations for his personal use.

(Title 18, United States Code, Sections 1341.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

3. I have been a Special Agent with the USAO-SDNY since 2015. Prior to that, I was a Special Agent with the Department of Homeland Security from 2002 to 2015. During my career in law enforcement, I have participated in numerous fraud investigations.

4. This Affidavit is based upon my personal participation in the investigation of this matter, my conversations with law enforcement agents and others, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated. Where figures, calculations, and dates are set forth herein, they are approximate, unless stated otherwise.

Background

5. Based on my participation in this investigation, I know that the USAO-SDNY and the Internal Revenue Service - Criminal Investigation (“IRS-CI”) have been investigating PAWEL BIELECKI, a/k/a “Paul Bielecki,” a/k/a “Paul HRH Saxe-Coburg-Gotha,” a/k/a “Dr. Phaakon Sonderburg-Glucksburg,” a/k/a “Father Paul,” a/k/a “Father Kowal,” the defendant, for perpetrating a fraudulent scheme to obtain donations for medical clinics in Beirut, Lebanon.

6. Based on my participation in this investigation, my review of reports and records, and my conversations with other law enforcement officers and other witnesses, I have learned that BIELECKI is a friar in the Province of St. Mary of the Capuchin Order (the “Province of St. Mary” or the “Province”), a Catholic order of priests and brothers. The Province of St. Mary is headquartered in White Plains, New York. The Province conducted an internal investigation of

BIELECKI's fraudulent scheme, referred the matter to the USAO-SDNY, and has since provided assistance in the USAO-SDNY's investigation.

7. Based on my participation in this investigation, my review of reports and records, my review of publicly available information, and my conversations with other law enforcement officers and other witnesses, I have learned that friars in the Capuchin Order, including PAWEL BIELECKI, a/k/a "Paul Bielecki," a/k/a "Paul HRH Saxe-Coburg-Gotha," a/k/a "Dr. Phaakon Sonderburg-Glucksburg," a/k/a "Father Paul," a/k/a "Father Kowal," the defendant, take a vow of poverty that requires them to renounce and not to hold any property or bank accounts in their name for their personal benefit. Friars in the Capuchin Order may hold bank accounts in their name solely to receive and pass along payments directed to the Province, so long as such bank accounts are directly monitored by a senior member of the Province. The Province provides friars, including BIELECKI, with a monthly stipend of approximately \$250 for personal expenses, as well as a credit card, paid for by the Province, for friary-related expenses.

8. Based on my participation in this investigation and my training and experience, I am aware that two particular companies (respectively, "Crowdfunding Company-1" and "Crowdfunding Company-2," and, together, the "Crowdfunding Websites") operate online websites that allow individuals to set up and promote fundraising campaigns, solicit donations, and transfer funds received to a bank account of their choosing.

The Scheme to Defraud

9. Based on my participation in this investigation, my review of reports and records, my review of publicly available information, and my conversations with other law enforcement officers and other witnesses, I have learned that PAWEL BIELECKI, a/k/a "Paul Bielecki," a/k/a "Paul HRH Saxe-Coburg-Gotha," a/k/a "Dr. Phaakon Sonderburg-Glucksburg," a/k/a "Father Paul," a/k/a "Father Kowal," the defendant, is engaged in an ongoing fraudulent scheme. As described further below, through appearances and advertisements on radio programs and online podcasts, as well as various other media, including campaigns on the Crowdfunding Websites, BIELECKI fraudulently obtains donations from victims by claiming, among other misrepresentations, to run medical clinics in Beirut, Lebanon, when in fact BIELECKI is keeping victims' donations for his personal use.

10. Based on my participation in this investigation, my conversations with other law enforcement officers and other witnesses, and my review of reports, records, and publicly available information, including recordings and transcripts of advertisements and radio and podcast appearances by PAWEL BIELECKI, a/k/a "Paul Bielecki," a/k/a "Paul HRH Saxe-Coburg-Gotha," a/k/a "Dr. Phaakon Sonderburg-Glucksburg," a/k/a "Father Paul," a/k/a "Father Kowal," the defendant, I know that from at least in or about June 2015 through at least in or about December 2023, BIELECKI has repeatedly appeared as a guest or through advertisements on a particular local New York radio show ("Radio Program-1"). During these appearances and advertisements, BIELECKI has repeatedly represented that he is a Catholic priest and physician living in Lebanon and running medical clinics there, with the goal of assisting Christians living in the Middle East. BIELECKI has also made similar appearances on other radio programs and electronic media. For example, on or about April 1, 2023, BIELECKI appeared on a second radio show ("Radio Program-2") to tell his "story" and to solicit donations for his purported medical clinics. Radio

Program-2 continued to solicit donations on behalf of BIELECKI on numerous occasions from at least in or around June 2023 through at least in or around August 2024.¹

11. Based on my participation in this investigation, my review of reports and records, my conversations with other law enforcement officers and other witnesses, and my review of recordings and transcripts of advertisements and media appearances by PAWEL BIELECKI, a/k/a “Paul Bielecki,” a/k/a “Paul HRH Saxe-Coburg-Gotha,” a/k/a “Dr. Phaakon Sonderburg-Glucksburg,” a/k/a “Father Paul,” a/k/a “Father Kowal,” the defendant, I know that BIELECKI has falsely represented, in sum and substance, among other things, the following:

- a. BIELECKI is a physician, vascular surgeon, cardiac surgeon, and/or general surgeon, and he has also earned multiple Ph.D. degrees;
- b. BIELECKI runs two medical clinics in Lebanon and is raising money for medicine, medical equipment, baby incubators, food, and an ambulance for his clinics in Lebanon; and
- c. BIELECKI, at the time of recording certain shows, was physically present in Lebanon, and he was badly injured and his clinics badly damaged by a widely reported August 2020 explosion in Beirut, Lebanon.

12. Based on my participation in this investigation, my review of reports and records, my conversations with other law enforcement officers and other witnesses, and my review of publicly available information, I understand that each of the above-described representations made by PAWEL BIELECKI, a/k/a “Paul Bielecki,” a/k/a “Paul HRH Saxe-Coburg-Gotha,” a/k/a “Dr. Phaakon Sonderburg-Glucksburg,” a/k/a “Father Paul,” a/k/a “Father Kowal,” the defendant, are false. For example:

- a. Based on my review of records obtained from the Province and from an elite New York-based university (“University-1”), I know that BIELECKI’s personnel file with the Province contains a fake diploma from University-1’s medical school dated May 2020, but University-1 has no record of BIELECKI’s attendance at or graduation from its medical school. Further, in a handwritten entry in his personnel file, BIELECKI claims to have earned a medical degree from an elite university in Paris, France (“University-2”) in just a single year of study in 2007, but during that time BIELECKI was living in Lebanon as a missionary. Based on my review of publicly available information, I understand that University-2 does not have a campus or medical school in Lebanon and does not offer a one-year medical degree.
- b. Based on my participation in this investigation, my review of reports and records, my conversations with other law enforcement officers and other witnesses, and my review of publicly available information, I understand that BIELECKI’s clinics in Lebanon do not exist.

¹ Radio Program-1 and Radio Program-2 are both streamed to audiences via the Internet, in addition to the radio.

- c. Based on my review of bank and credit card records for accounts held by BIELECKI, I believe that BIELECKI was present in New York on specific dates when he claimed, in his radio appearances and in other electronic communications, to be in Lebanon on behalf of his purported medical clinics. Moreover, based on my review of records from the United States Customs and Border Protection (the “CBP”) and of financial records, I know that BIELECKI was in the United States at the time of the August 2020 explosion in Beirut—and in fact was in the United States continuously from in or around December 2019 through in or around April 2022. Indeed, on and around the date of the explosion in Beirut in which BIELECKI told victims he was injured, BIELECKI made several purchases at coffee shops, restaurants, and other businesses in New York, NY.

13. Based on my participation in this investigation, my review of reports and records, my conversations with other law enforcement officers and other witnesses, and my review of publicly available information, I understand that PAWEL BIELECKI, a/k/a “Paul Bielecki,” a/k/a “Paul HRH Saxe-Coburg-Gotha,” a/k/a “Dr. Phaakon Sonderburg-Glucksburg,” a/k/a “Father Paul,” a/k/a “Father Kowal,” the defendant, has used the above-described misrepresentations to seek donations for his purported medical clinics in Lebanon through Radio Program-1, Radio Program-2, and other electronic and radio media. In fraudulently soliciting these donations, BIELECKI has directed victims to make donations—and victims in fact have made donations—through various methods including:

- a. From at least November 2016 through at least July 2019, BIELECKI directed victims to make out checks to the Province of St. Mary, headquartered in White Plains, NY, with “Fr. Paul Bielecki’s Mission” or a similar endorsement on the memo line. Based on my review of checks mailed to the Province of St. Mary, I know that victims—including victims based in New York, New Jersey, Connecticut, Georgia, and Florida—in fact mailed checks to the Province with such an endorsement on the memo line.
- b. From at least April 2021 through the present, BIELECKI directed victims to send donations by mail to “St. Francis in Beirut Inc.”—a non-profit entity established in or about March 2021—at the address of a particular Capuchin Order friary in New York, NY (the “Manhattan Friary”), where BIELECKI resides. BIELECKI is the corporate secretary of St. Francis in Beirut Inc.
- c. At various times during the fraudulent scheme, BIELECKI has also obtained donations through the Crowdfunding Websites—including online campaigns through Crowdfunding Company-1,² which have raised at least approximately \$78,000 for BIELECKI’s purported clinics in Lebanon. BIELECKI has also fraudulently solicited donations through posts on church profile pages on a particular social media website and through online and print church bulletins, which seek donations to be sent either by mail to BIELECKI’s residence at the Manhattan Friary and/or by wire to a bank account controlled by BIELECKI. Based on my participation in this investigation, my review of reports and records, and my

² Based on my review of publicly available information, I understand that Crowdfunding Company-1 is headquartered in California and does not have offices in New York.

conversations with law enforcement officers and other witnesses, I understand that BIELECKI has also solicited donations for his purported clinics in person at church masses and other church events.

- d. BIELECKI has also directly provided his bank account and Zelle payment information to victims via email and other means of communication, and BIELECKI has directed victims to send donations directly to his bank account via wire transfer, Zelle payment, or other similar means. Based on my review of BIELECKI's financial records and email accounts, I know that victims, including victims based in New York, Pennsylvania, New Jersey, and elsewhere, have in fact made such payments to BIELECKI.

14. As described in Paragraph 7, above, friars in the Capuchin Order, including PAWEL BIELECKI, a/k/a "Paul Bielecki," a/k/a "Paul HRH Saxe-Coburg-Gotha," a/k/a "Dr. Phaakon Sonderburg-Glucksburg," a/k/a "Father Paul," a/k/a "Father Kowal," the defendant, take a vow of poverty. Based on my participation in this investigation, my conversations with other law enforcement officers and other witnesses, and my review of reports and records, including bank statements, credit card statements, and other financial and transactional documents, I know that—despite his vow of poverty—BIELECKI maintains multiple credit or debit card accounts and multiple bank accounts at a particular financial institution ("Financial Institution-1"). Further, I understand that dozens of victims have cumulatively provided BIELECKI with at least hundreds of thousands of dollars in donations as a result of BIELECKI's fraudulent misrepresentations:

- a. In addition to the roughly \$78,000 raised in online campaigns through Crowdfunding Company-1 discussed above, I know that between approximately March 2018 and approximately October 2023, BIELECKI received through one of his bank accounts at Financial Institution-1 more than 150 checks and monetary transfers—totaling more than \$230,000—that I understand are the result of BIELECKI's fraudulent misrepresentations, based on my review of the memo lines and payee information of the payments, my review of BIELECKI's email communications with the victims, and my review of donor information from Crowdfunding Company-1, among other sources.
- b. Further, based on my review of reports and records and my conversations with law enforcement officers and other witnesses, I understand that BIELECKI received victim donations relating to BIELECKI's misrepresentations through multiple additional channels, including mailed cashier's checks, online payments, and other sources and means.

15. Based on my participation in this investigation, my review of reports and records, and my review of bank statements, credit card statements, and other financial and transactional documents, I understand that PAWEL BIELECKI, a/k/a "Paul Bielecki," a/k/a "Paul HRH Saxe-Coburg-Gotha," a/k/a "Dr. Phaakon Sonderburg-Glucksburg," a/k/a "Father Paul," a/k/a "Father Kowal," the defendant, appears to have used the donations he received as a result of his misrepresentations for personal purposes. Between approximately December 2017 and approximately February 2024, BIELECKI, despite taking a vow of poverty, has withdrawn almost \$50,000 in cash from his bank accounts at Financial Institution-1; has transferred more than \$600,000 to two credit card companies to pay for personal expenses, including spending up to

\$334.40 per month for a membership at a luxury gym chain, and paying for multiple trips to the Hamptons and numerous meals at high-end restaurants; and has paid for numerous other personal expenses through debit card payments and other means.³

16. For example, based on my participation in this investigation and my review of records obtained from an email provider used by PAWEL BIELECKI, a/k/a “Paul Bielecki,” a/k/a “Paul HRH Saxe-Coburg-Gotha,” a/k/a “Dr. Phaakon Sonderburg-Glucksburg,” a/k/a “Father Paul,” a/k/a “Father Kowal,” the defendant, as well as from Financial Institution-1, a New York-based liposuction clinic, and the CBP, I have learned the following:

- a. On or about December 24, 2021, Victim-1, who resides in Pennsylvania, emailed BIELECKI wishing him and “the people of Lebanon . . . many blessings of consolation and peace during this Holy Season.” On or about January 7, 2022, BIELECKI replied that he was “buying a new ambulance” that would “allow [him] to visit villages far north and provide medical help.” Based on my review of documents from the CBP, I know that BIELECKI was present in the United States continuously from on or about December 29, 2019 through on or about April 6, 2022, and therefore not in Lebanon at any point during that period.
- b. On or about January 15, 2022, Victim-1 replied, expressing her happiness that “the many prayers for an ambulance were answered,” offering her and her husband’s “additional assistance to you for purchasing supplies and fuel to undertake this mission,” and stating that there “will be a deposit into your account next week.” On or about January 27, 2022, Victim-1 confirmed that a “deposit to help with the ambulance expenses and for the desperate needs of the people” had been “placed into [BIELECKI’s] account.” Based on my review of financial records, I know that BIELECKI received a wire transfer from Victim-1 in the amount of \$10,000 with a wire notation of “Mission Help” on or about January 26, 2022.
- c. On or about February 1, 2022, BIELECKI emailed Victim-1 to thank her and to note that he was “finalizing ambulance, so excited thanks to you.” Based on my review of financial records, I understand that there is no record of the above-described \$10,000 donation from Victim-1 being used for the purchase of an ambulance or otherwise transferred to medical clinics in Lebanon or any charitable or religious cause.
- d. A few days later, on or about February 7, 2022, BIELECKI saved a screenshot of a Google search for “laser assisted liposuction.” One week later, on or about February 15, 2022, BIELECKI attended a “Body Contouring Examination” appointment at a New York-based liposuction clinic, during which he scheduled a \$15,000 aesthetic plastic surgery procedure.
- e. Also on February 15, 2022—shortly after attending the liposuction clinic appointment in New York—BIELECKI emailed Victim-1 (pictured below) that

³ Based on my review of financial records and email records, I understand that the fraudulent scheme was not BIELECKI’s sole source of income, and that at various times BIELECKI received income from outside employment.

BIELECKI had already used the ambulance to assist a “few villages with medical help” and that “[p]eople were crying,” and informing Victim-1 that BIELECKI would have to wait to purchase a generator because “I used all the help for ambulance and medical supplies.”

From: PAUL <beirutpaul@gmail.com>
Subject: Re: mission help
Sent: Tue 2/15/2022 7:01:00 PM (UTC)
To: [REDACTED]

Dear [REDACTED]
 God is great. And your prayers and help is very much appreciated.
 The ambulance is ok to go. I already did few villages with medical help. People were crying. Almost a year we could not reach out to them. We did not have ambulance, and thanks to you we have it now:)
 For a generator, I will have to wait. I used all the help for ambulance and medical supplies. One day, one day...
 How are you? And your husband?
 God bless you both every dayevery minute,
 Love,
 Fr. Paul

- f. On or about March 8, 2022, BIELECKI received the planned aesthetic plastic surgery procedure at the New York-based liposuction clinic. BIELECKI paid approximately \$15,000 to the liposuction clinic for the procedure through a variety of payment methods in or around February and March 2022.
- g. One week after the aesthetic plastic surgery procedure, on or about March 15, 2022, Victim-1 and BIELECKI exchanged approximately four emails, in which BIELECKI asserted that he was in Lebanon, “doing our best to keep surgeries running” and continuing to “[v]isit villages.” Also on March 15, 2022, BIELECKI made a \$1,000 cash withdrawal, used his credit card to pay for a New York taxi and for a \$433.37 purchase at a high-end men’s clothing store in New York, and used his debit card for multiple additional purchases in New York, including a purchase at a high-end coffee-and-juice chain.
- h. Based on my review of BIELECKI’s email accounts and financial records, I know that Victim-1 and her husband transferred approximately \$84,000 to BIELECKI’s bank account between approximately June 2020 and October 2023, and that BIELECKI exchanged more than 150 emails with Victim-1 between March 2018 and February 2024, including numerous additional emails containing false representations about BIELECKI’s presence in Lebanon and/or his purported medical clinics there.
- i. Based on my review of BIELECKI’s email accounts and financial records and my review of publicly available information, I believe that BIELECKI was present in New York, NY at the time he sent most or all of the above-described emails containing misrepresentations to Victim-1, who resides in Pennsylvania. Further, I understand that BIELECKI’s email provider does not have any data centers in New York, such that the above-described emails sent from New York would have traveled from inside New York to a server and/or data center outside of New York.

17. As described in Paragraph 13, above, PAWEL BIELECKI, a/k/a “Paul Bielecki,” a/k/a “Paul HRH Saxe-Coburg-Gotha,” a/k/a “Dr. Phaakon Sonderburg-Glucksburg,” a/k/a “Father Paul,” a/k/a “Father Kowal,” the defendant’s, position as a friar in the Province helps to facilitate the fraudulent scheme, including by helping BIELECKI to obtain donations from victims. Based on my participation in this investigation, my review of reports and records, and my conversations with other law enforcement officers and other witnesses, I also know that, in addition to the false statements described in Paragraph 11 above, BIELECKI has repeatedly made several other misrepresentations to carry out his fraudulent scheme and to conceal the scheme and its proceeds from the Province, the Internal Revenue Service (“IRS”), and others. For example:

- a. BIELECKI has represented in oral and written communications with the Province, among other things, in sum and substance, that he is conducting advanced, confidential scientific research on behalf of the United Nations (the “UN”) and the Defense Advanced Research Projects Agency (“DARPA”).⁴ BIELECKI has also submitted tax documents to the Province for at least the 2020, 2021, and 2022 tax years purporting to reflect income from the UN for this work. Based on my participation in this investigation, my review of reports and records, my conversations with other law enforcement officers and other witnesses, and my training and experience, I believe that BIELECKI has used his purported “UN-DARPA” work to disguise income he received from his fraudulent scheme.
- b. BIELECKI has used various aliases, including aliases involving the names “Glucksburg” and “Sonderburg,” among others, to carry out and conceal his fraudulent scheme. Based on my review of reports and records and my conversations with law enforcement officers and other witnesses, I understand that BIELECKI provided the Province with photocopies of multiple foreign passports issued under these aliases, including a Norwegian passport issued to “Paul Haakon Harald Bielecki (House of Glucksburg)” and a French passport issued to “Paul Son Altessehaakon Harald Bielecki (House of Glucksburg),” as well as a photocopy of what appears to be a Polish diploma issued to “Pawel Kurysz.” Further, based on my conversations with other law enforcement agents and my review of reports and records, I understand that BIELECKI legally changed his name to “Paul HRH Saxe-Coburg-Gotha” in or around September 2023. Based on my training and experience and my participation in this investigation, I understand that “HRH” is an abbreviation for “His Royal Highness.”
- c. BIELECKI has created multiple web domains and numerous email addresses under a variety of aliases, including the above-described aliases, which BIELECKI has used to help conceal his fraudulent scheme. For example, BIELECKI appears to have created the web domain “darpa-un.org” and registered at least four email addresses at that web domain in connection with BIELECKI’s false representations that he does medical research for “UN-DARPA,” which, in turn, facilitate BIELECKI’s concealment of the fraudulent scheme from the Province, the IRS, and law enforcement:

⁴ Based on my training and experience and my review of publicly available information, I know that DARPA is a research and development agency within the United States Department of Defense whose mission is “to make pivotal investments in breakthrough technologies for national security.”

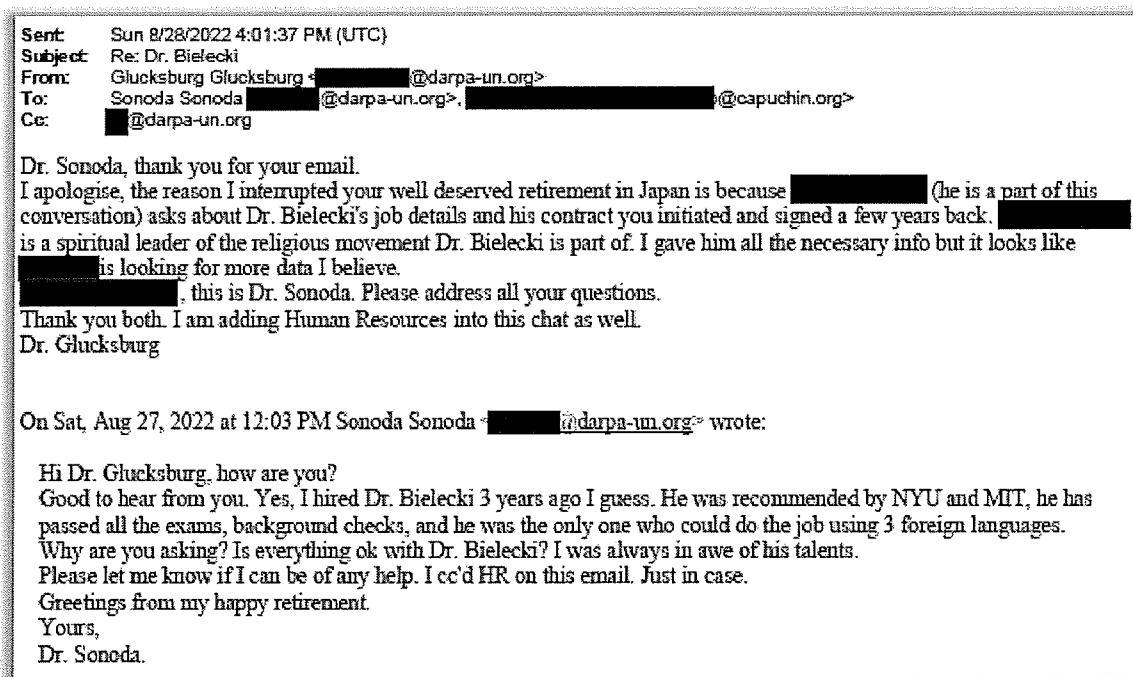
- i. Based on my review of reports and records and publicly available information, I understand that the domain “darpa-un.org” was created on or about August 11, 2022, and it does not appear to be associated with a functional website.
- ii. In or around the summer of 2022, the Provincial Minister of the Province, whose duties include overseeing employment by friars in the Province, attempted to verify BIELECKI’s claimed employment with, and income from, the UN and/or DARPA. On or about August 11, 2022—the same day that the “darpa-un.org” domain was created—the Provincial Minister received an email (pictured below) from an email address at “darpa-un.org” (“DARPA-UN Email-1”) in which the sender claimed to be “dr. PHaakon Sonderburg-Glucksburg” in charge of “Darpa-UN scientific projects” offering to verify the work of “Dr. Bielecki.” As described in Paragraph 17(b), above, “Glucksburg,” “Sonderburg,” and “Haakon” are all aliases used by BIELECKI.

Sent: Thur 8/11/2022 6:06:08 PM (UTC)
Subject: Dr. Paul Bielecki
From: Glucksburg Glucksburg <[REDACTED]@darpa-un.org>
To: [REDACTED]@capuchin.org <[REDACTED]@capuchin.org>

Good evening [REDACTED].
 I am dr. PHaakon Sonderburg-Glucksburg. I am running Darpa-UN scientific projects.
 Dr. Bielecki informed me you need some information about his work? How can I help?
 Just FYI, I am not sure I can discuss all his scientific work with you but let me know what you need.
 Thank you.
 Dr. Glucksburg

- iii. On or about August 12, 2022, after the Provincial Minister responded to “Glucksburg” requesting information and an on-site visit. Later the same day, “Glucksburg” responded from DARPA-UN Email-1 with a multi-paragraph message raving about BIELECKI’s scientific research, noting that “Glucksburg” was based “in South Asia” and thus could not meet with the Provincial Minister, and stating BIELECKI could not take the Provincial Minister for an on-site visit to “the UN research center because of UN covid policy.”
- iv. On or about August 16, 2022, the Provincial Minister responded to “Glucksburg,” stating that he needed to meet with someone at “UN-DARPA” to go over BIELECKI’s contract and noting that the contract that BIELECKI had provided to the Province was more than two years old and signed by a “Dr. Ho Sonoda.” The Provincial Minister asked if a meeting with “Dr. Ho Sonoda” would be possible. On or about August 17, 2022, “Glucksburg” responded that he had replaced Dr. Sonoda, that the “HR for all UN people” is based in Budapest, and that “Glucksburg” was personally responsible for extending contracts for “UN-Darpa scientists.”

- v. On or about August 27, 2022, an email was sent from a second email address at “darpa-un.org” purporting to belong to “Dr. Ho Sonoda” (“DARPA-UN Email-2”) to DARPA-UN Email-1, copying a third email address at “darpa-un.org” purportedly belonging to the Human Resources department (“DARPA-UN Email-3”). In the email, “Dr. Sonoda” states that she has retired, provides rave reviews of BIELECKI’s credentials and scientific work on behalf UN-DARPA, and notes that she has copied the HR department on the email “[j]ust in case.”
- vi. On or about August 28, 2022, “Glucksburg” responded from DARPA-UN Email-1 to the “Sonoda” and “HR” accounts, and added the Provincial Minister to the email thread (pictured below), such that the Provincial Minister could see the email from “Dr. Sonoda” sent the prior day. In the August 28 email, “Glucksburg” apologizes to “Dr. Sonoda” for interrupting her “well deserved retirement in Japan” and directs the Provincial Minister to address any questions to “Dr. Sonoda.”



- vii. Based on my review of records from BIELECKI’s email and cellphone providers, I understand that DARPA-UN Email-1, DARPA-UN Email-2, and DARPA-UN Email-3 list BIELECKI’s cell phone number as the recovery number for the email account, are associated with the same Android profile as BIELECKI’s personal email accounts, and/or list BIELECKI’s personal email as the recovery email for the account.
- viii. Based on the foregoing, as well as my participation in this investigation and my training and experience, I believe that BIELECKI is the user of

DARPA-UN Email-1, DARPA-UN Email-2, and DARPA-UN Email-3, and that BIELECKI sent the above-described emails from those accounts to the Provincial Minister in an effort to conceal the fraudulent scheme and the proceeds BIELECKI had received therefrom.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of PAWEL BIELECKI, a/k/a "Paul Bielecki," a/k/a "Paul HRH Saxe-Coburg-Gotha," a/k/a "Dr. Phaakon Sonderburg-Glucksburg," a/k/a "Father Paul," a/k/a "Father Kowal," the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.

/s/ Sean Smyth by JCM with permission

SEAN SMYTH

Special Agent

U.S. Attorney's Office - Southern District of New York

Sworn to before me this 16th day of August, 2024.

Judith C. McCarthy
THE HONORABLE JUDITH C. MCCARTHY
United States Magistrate Judge
Southern District of New York